Working at height

**Scope**
This Standard addresses the requirements of the Working at Height Regulations and how these regulations should be incorporated into work practices.

**Law**
The Working at Height Regulations 2005
Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
Provision and Use of Work Regulations 1998 (PUWER)

**Training / information / instruction required**
Risk Assessment training if carrying out risk assessments
Health and Safety for Managers training if managing working at height.

**Additional sources of information**
Safe use of Ladders and Stepladders, HSE
Top tips for ladder safety, HSE
The selection of mobile elevated work platforms, HSE
www.wahsa.org.uk
www.pasma.co.uk
Introduction.
1. The aim of this Standard is to enable people who manage work at height to make informed decisions about the most appropriate equipment and methods to use.
2. This Standard is based on the requirements of the Working at Height Regulations 2005 and applies to all working at height. For the purposes of the University anyone managing work at height, or carrying out work at height is bound by this Standard, including students, staff, student helpers and contractors.
3. A place is ‘at height’ if a person could be injured falling from it, even if it is at or below ground level.

Controlling risk
4. Working at height (wah) within the University is controlled in one of two ways; tasks and activities covered by a permit to work and those activities not requiring a permit to work. **All working at height requires a risk assessment.** Permits to Work are issued by the Assistant Facilities Manager (AFM) for a site and will require a suitable and sufficient risk assessment and description of how the work is to be carried out no less than 5 working days before work is due. A copy of the Working at Height Permit to Work is available in the appendix. These will only be issued by the AFM, this copy is for reference only.

<table>
<thead>
<tr>
<th>Requiring a permit to work</th>
<th>Not requiring a permit to work</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any wah undertaken by a contractor</td>
<td>Routine use of library steps or other ladders, kick stools or short steps in workshops, learning zones, studios or central stores.</td>
</tr>
<tr>
<td>Any wah, using equipment other than stepladders, kick stools, library ladders, short ladders or scaffold towers.*</td>
<td>During the preparation of student shows where the work has been risk assessed and is under the direct supervision of competent members of staff.</td>
</tr>
<tr>
<td>Access to the roof spaces other than a preliminary inspection accompanied by the AFM, or during an emergency evacuation where the evacuation route passes across a roof.</td>
<td>During a performance or rehearsal where the working at height is integral to the performance.</td>
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<tr>
<td></td>
<td>Where working at height is part of work being managed by a principal contractor and control over the site has been ceded to that contractor for the</td>
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</tbody>
</table>
Any work over a pit or excavation. | duration of the work and the contractor is directly responsible for the implementation of appropriate safety controls, including the issuing and management of permits to work.

* This restriction does not apply to routine work being carried out by technical staff in the RHS Space JPS nor the Wimbledon or KX theatres using equipment other than that described above.

5. Working at height should be avoided whenever possible. If a task can be completed either partially or totally at ground level, without creating additional risks greater than the risk of falling, or falling objects then this should be done. The possibilities of not working at height must be considered as the primary control measure when assessing a task.

6. An assessment of the risks from working at height should be done as part of the general risk assessment for the task and recorded on the general risk assessment form, a separate assessment is not required.

7. There is a simple hierarchy for managing and selecting equipment for work at height. This should be followed when assessing the risks of working at height. The hierarchy is as follows;
   - avoid working at height when it is reasonably practicable to carry out work safely otherwise than at height e.g. window cleaners using long poles and cleaning from the ground rather than using ladders.
   - when working at height cannot be avoided work equipment or other measures should be used to prevent falls e.g. cherry pickers or scaffold towers rather than stepladders; and,
   - if it is not reasonably practicable to eliminate the risk of a fall work equipment or other measures should be used to minimise the distance and consequences of a fall e.g. a fall arrest system, nets or bags.
   - If working at height cannot be avoided there must be adequate emergency and rescue procedures. These must be in place before work commences and anyone likely to be involved in a rescue or other emergency must know what to do and should have practiced the procedures.
   - For the purposes of the University ‘work activity’ includes work carried out by University employees, students, volunteers and, to some extent, contractors. Work activities covered by the Regulations will include the use of stepladders, access platforms, mobile elevated work platforms (MEWPS, or cherry pickers), kick-steps, rope work, working on roofs, around pits and excavations.
● The Regulations do not apply to the provision of paid instruction or leadership in
caving or climbing by way of recreation, team building or other activities. Although
these activities are subject to the requirement to complete risk assessment for all
work activities.

Repeated or similar tasks
8. If a task is repeated or there are many similar tasks involving the same equipment and
people with similar skills then it is unlikely a risk assessment will be needed every time
the task is carried out. A generic assessment can be completed and the control
measures applied. For example, if items are stored at a height requiring some form of
step or ladder, and it is not reasonably practicable to store the items elsewhere, a risk
assessment should be completed for the task of reaching the items and applied to all
similar situations. A second example would be if it as necessary to work at height in a
photography studio to change equipment or take pictures; assessments can be
completed of the tasks and the control measures applied as part of studio practice, or
‘studio rules’ and followed by all users of the space.
9. Generic assessments such as those described above are useful but must be revised
regularly to ensure they remain valid, and reviewed if any of the hazards and risks
identified in the original risk assessment change. For example; if the items being stored
at height change and are heavier or much larger than those considered in the original
risk assessment the risks will have changed and probably increased, a step ladder may
no longer be appropriate, it may no longer be safe to store them at height. The risk
assessment must be revised to reflect this. In the second example; if a student wishes to
move out of the studio and take pictures in a public area the risks will have
changed and the risk assessment will have to be revised. In both of these examples the generic
assessment can be used as a reference but must be altered.

Responsibilities
10. People managing or specifying work at height have several duties; listed below in
appendix 2. They must be competent, that is, have the knowledge and skill to make
decisions about appropriate methods and control methods for working at height.
11. As with all student risk assessments any assessment and plan for working at height
should be signed off by the academic supervisor
12. Employees or those working under another’s control must:
   ● report any hazards to the responsible person,
   ● use the equipment supplied properly,
   ● follow any training and instruction, unless they think it is unsafe to do so when they
     should seek further instruction before continuing.

Training and competence
13. Scaffold towers
Any person, whether a member of staff, student visitor or contractor must have a valid PASMA ‘Towers for Users’ certificate before setting up or using any scaffold towers on University sites or whilst carrying out University business off site.
Any person designing, directing or risk assessing any task involving the use of scaffold towers must have a valid PASMA ‘Towers for Managers’ certificate.
If contractors are being engaged to carry out work involving the use of scaffold towers they must be informed of the need to have the correct PASMA certification and bring proof of this on-site every time. If valid certification cannot be produced permits to work will not be issued and work will not be authorised.

14. Low-level access equipment.
This includes any access equipment with an access platform lower than 2.5m
Any person, whether a member of staff, student or contractor must have a valid PASMA ‘Low level access equipment’ certificate before setting up or using any low level access equipment such as podium platforms on University sites or whilst carrying out University business off site.

15. Stepladders
Any member of staff or student using stepladders at any time on University sites or whilst carrying out University business off site must have completed the Ladder Safety module on Blackboard and have passed the on-line assessment.
Any member of staff with responsibility for inspecting stepladders and/or issuing ladders to students and other staff must have received training in the inspection of ladders and maintenance of the ladder log paperwork.
All Facilities staff responsible for issuing Authorisations to Work or Permits to Work must have received training in the inspection of ladders.

16. Harnesses and ropes
Harnesses and ropes for access or as a fall arrest or fail restraint are subject to pre-use inspections and thorough inspections at least every 6 months. The inspections must be carried out by a competent person and are usually specific to the type and make of the equipment being used. All use of harnesses, rope access and fall arrest/restraint systems must be subject to a suitable and sufficient risk assessment.
If a Class 1 Anchor point, often called an eyebolt, is to be used to anchor a fall arrest system it must have been subjected to a thorough examination and test within the previous 6 months and this must be marked on the equipment.

17. Other equipment for working at height
Kick steps and short steps. Instruction should be given about the safe use of this type of equipment, this can be done during an induction and reinforced with visual aids in the areas the equipment is likely to be used, or attached to the equipment itself.

Library steps. The safe use of this equipment should be included in the induction of all staff working in the library.

**Inspections and maintenance.**

18. All equipment used to work at height will be subject to inspection. These inspections may be completed by University staff or, for more complex pieces of equipment such as harnesses, access ropes and scaffolding the users will be required to provide proof of inspection and competence to use. Without proofs of safety, or if equipment fails visual inspection it will not be allowed on-site and use will be prohibited by anyone, including the owners of the equipment. Equipment will be returned to an individual when they leave site.

19. Stepladders

   All stepladders owned by the University will be subject to inspection no less than quarterly. Stepladders issued to staff and students from a centrally controlled store will be inspected before issue and records will be kept. Every ladder will be uniquely identifiable and have a tag indicating that it has passed or failed an inspection, who carried out the inspection and the date of the next quarterly inspection. Ladders that have failed inspection will be marked with a red tag and taken out of use as soon as possible after inspection, they will not be allowed back into use unless repaired and re-inspected successfully. Equipment that fails inspection and cannot be repaired will be thrown away and must not be passed on to anyone for use outside the University.

   Stepladders being brought onto site by contractors, visitors, students or student helpers will be subject to a visual inspection. Although arrangements may differ slightly from site to site, as a general rule ladders bought onto site by contractors being issued with an authorisation or a permit to work will be inspected by facilities staff, usually the AFM; stepladders being bought onto site by students or student helpers will be inspected by the member of staff supervising the activity for which the ladder is being used. If a ladder belonging to a contractor, student or student helper fails the inspection they will not be allowed to use the equipment.

20. Scaffold towers

   Scaffold towers will be inspected before use by a competent person that is, someone with a valid PASMA ‘Towers for users’ certificate. Records will be kept of the
inspections. In the event of any damage that may affect the safety and performance of the equipment it will be re-inspected. If scaffold towers are being bought onto site by contractors or students to use proof of inspection by a competent person must be provided in writing before the equipment is put into use.

21. Library steps, kick steps and low steps.
   This equipment should be uniquely identifiable and records kept of checks. Each piece of kit should be checked no less than quarterly.
   **Kick steps**
   - The base is in good condition, it is not loose or damaged, no rough edges or wear and tear that could cause the step to snag on floor
   - The top is in good condition, not damaged or degraded in any way. Some wear and tear to the non-slip surface is to be expected, but any damage that could cause the user to trip or slip should be repaired immediately or the equipment taken out of use. If the non-stick covering is loose it should be secured or replaced.
   - There should be no significant damage to the sides of the kick step, a small amount of wear and tear is to be expected but significant dents and any punctures or corrosion in the fabric should be repaired and the equipment taken out of use immediately.

   **Small steps - folding steps with no more than two steps.**
   - The feet are in good condition. Non-slip feet are all present and in good condition with no wear or tear that could cause snagging. No part of the step frame should be visible through the non-slip covering.
   - The frame is not dented or deformed in any way. There are no deep scratches in the frame.
   - The locking mechanism that limits the angle of opening is in good condition, no dents or deformation and all the fixtures are in place and in good condition.
   - The steps are securely attached, all the fixings are in place and in good condition with no sign of corrosion. The steps are not dented or deformed in any way.
   - Steps and frame are free from any paint or varnish that could cover damage.
   - The steps are stable, when open they do not wobble and none of the components are loose.

   **Library steps**
   Complete the same visual checks as for stepladders but these steps will not be EN131 or Class 1 steps.
22. Step ladders

- The feet are in good condition. Non-slip coverings are in place and in good condition with no significant wear or tear.
- The frame is in good condition, no signs of wear and tear, no dents or deformation of any kind.
- Locking straps are in good condition, not bent, buckled or torn. If fabric then no sign of wear or fraying.
- The steps must be in good condition, no dents or deformation. All fixings in place and in good condition.
- No signs of corrosion or cracking.
- Not covered in paint or varnish sufficient to cover any damage or wear and tear.
- Must be stable, not wobbling at all.
- All fixings must be in place and in good condition, not lose.
- The ladders are class 1 or EN131 class ladders. Anything else, or a lack of categorisation will mean the ladders fail inspection. The ladders should also be clearly marked with the safe working load. If this is not visible the ladder should be taken out of use and if possible the SWL verified. Ladders missing this information should not pass inspection.

23. Access to roofs and parapets.

Access to the roof areas of University buildings is strictly controlled by the Assistant Facilities Manager for each site. Any member of staff, student, contractor or visitor wishing to access a roof area will require permission from the AFM. Anyone wishing to carry out work on a roof will have to complete a risk assessment; all work is controlled by the Permit to Work. This includes student access to the roof spaces. The only exception is during an evacuation for those roofs that form part of the evacuation route from a building.

24. Harnesses and access ropes

This equipment is not routinely used in the University and is likely to only be used by a contractor, performer or possibly a student for a specific piece of work. The person using the equipment is responsible for carrying out pre-use checks and ensuring the equipment has been subject to a thorough inspection and test within the period specified by the risk assessment. All equipment used for lifting people must be inspected at least once every 6 months. If equipment is being used in circumstances likely to cause wear and tear it should be subject to thorough examination and test more frequently.

This shorter period should be identified by risk assessment. There is no national standard for competence in inspection of harnesses, access ropes, fall arrest or restraint
systems, to prove competence the person using the equipment must provide a copy of their training certificate for the equipment they are using, usually issued by the manufacturer. They should also provide proof of thorough inspection and test by providing a copy of the test certificate specifically equipment they are using, the serial number of equipment is usually used as the unique identifier.
Appendix 1 – reference copy of the Working at Height Permit to Work

| PERMIT TO WORK | PERMIT TO WORK No.
|----------------|------------------|

**Details of Work/Activity:**

- **Specific Building:** As above
- **Room Numbers:** As above
- **Name of person in charge of "doing" work on site:** As above
- **Number of others working under this Permit to Work:** As above

**Detail of "specialist" access equipment to be used:**

<table>
<thead>
<tr>
<th>Hazard and Control Checklist</th>
<th>YES</th>
<th>NO</th>
<th>N/A</th>
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<tbody>
<tr>
<td>1. Has it been established that the activity/work cannot be undertaken from ground level?</td>
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<tr>
<td>2. Has personal protective equipment (PPE) been provided, and is it being worn, understood, and suitable for the task?</td>
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<td>3. Has a written risk assessment been prepared and approved?</td>
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<td>4. If hoists, cranes, or other mechanical aids are to be used, has the working procedure been approved?</td>
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<td>5. If a Mobile Elevated Work Platforms (MEWP) is used is the person operating it competent to do so and have appropriate training?</td>
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<td>6. If Confined Space is used has the person(s) entering and/or using the required appropriate training (RSIA)?</td>
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<td>7. Has the equipment been inspected and found suitable for the intended use?</td>
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<td>8. If work cause conditions that affect systems under the control of others, have they authorized the works &amp; controls?</td>
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<td>9. If equipment is being serviced is it being isolated from the power supply/connected pipework/ducts etc. the person area &amp; insulated as necessary?</td>
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<td>10. Is the working area free from tripping hazards (i.e., pipes, cables, uneven surfaces), slipping hazards (i.e., oil/water spills) and hazards such as splinters?</td>
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<td>11. Is the work area protected by suitable edge protection such as guard rails and toe boards?</td>
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<tr>
<td>12. Is the area below confined off ensuring there is reasonable protection of persons having access to the area?</td>
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<tr>
<td>13. Are there adequate task and environment lifting, including access &amp; bail hooks &amp; any lifting equipment &amp; has charged</td>
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<td>14. Are all necessary agent equipment such as trolleys, pump, etc provided and used instead of the use of personnel?</td>
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<tr>
<td>15. Are there suitable and tested (with tool &amp; equipment procedure for emergency rescue to &quot;over a person&quot; if they have fallen whilst working in a harness/support?</td>
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<tr>
<td>16. Are adequate, reserved arrangements in place for: - raising an emergency alarm, first aider; and calling emergency services?</td>
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<tr>
<td>17. ASBESTOS REGISTER - I have checked there are no Asbestos Containing Materials in these areas that may become dangerous as a result of this work.</td>
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<tr>
<td>18. Satisfied that other activities/critical systems related to this work have been identified and is safe to do the work.</td>
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</table>

This Permit MUST be issued for the **SHORTEST** reasonable period of time (never usually longer than 12 Hours).

**Authorization:**

Only when satisfied that those involved in the activity are competent and a safe system of work, including controls, is suitable, sufficient and adequate. The UAL "Must be responsible for monitoring the activity/work to ensure, as far as reasonably practicable, that safe working practices are adhered to. NOTE: Where the safe systems of work have been vetted and approved by a person other than UAL, THEY MUST complete the first box below.

**UAI Authoriser:**

<table>
<thead>
<tr>
<th>Approving Manager</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>From 11 00</td>
<td>28 06 11</td>
<td></td>
</tr>
<tr>
<td>To 00 00</td>
<td>29 06 11</td>
<td></td>
</tr>
</tbody>
</table>

**Acceptance:**

This section must be completed by a person responsible for doing the work AND who will be on site for its duration.

<table>
<thead>
<tr>
<th>Person in Charge of Work</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name:</td>
<td>Signature</td>
</tr>
</tbody>
</table>

**Clearance:**

This section must be completed by a person(s) who completed the acceptance section above. *Delete as appropriate.

<table>
<thead>
<tr>
<th>Person in Charge of Work</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name:</td>
<td>Signature</td>
</tr>
</tbody>
</table>

**Cancellation of Permit:**

To be completed by the Security to confirm the form has been completed in full.

<table>
<thead>
<tr>
<th>UAL Issuer</th>
<th>Name</th>
<th>Signature</th>
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</table>
Appendix 2—Duties of people organising work at height

Any person specifying or managing work at height must ensure the following is completed;

- Plan and organise work at height properly.
- Avoid working at height. People shouldn't work at height if it is safe and reasonably practicable to carry out the work not at height.
- Ensure all work at height is properly planned, appropriately supervised and carried out in as safe a manner as reasonably practicable with regard to the hierarchy given above. This applies equally to students who should include the installing and taking down/removing of any work when completing project risk assessments,
- Plan for emergencies and rescue
- Take account of any existing risk assessments. If access equipment, for example, a ladder, is used regularly there is likely to be an existing risk assessment and control measures for the use of ladders in general. This should be referred to when assessing a task involving the use of ladders.

Take account of weather conditions that could endanger health and safety when working at height.
This usually means rain or high winds. However for work taking place on exposed platforms or at high level, i.e. on a roof, high temperatures and strong sun should also be considered a risk factor.
- After extreme weather events such as high winds and/or heavy rain or snow scaffolding and other platforms should be re-inspected to ensure they are still structurally sound and safe to use.

Those involved in work at height are trained and competent.
This might include people who are not actively working at height but assisting and will include any emergency and rescue procedures.
- People who regularly use ladders should be given some basic training. Contact the College H&S Adviser for additional information. The HSE publication ‘Top tips for ladder safety’ provides useful information and should be issued to all those using ladders and step ladders.
- People erecting or inspecting scaffolding and scaffolding towers must be competent to do so and should attend specialist training with regular updates. Contact the Local H&S Adviser for additional information.
- If working at height is part of teaching then students must be supervised by a competent person.
- If the risk of falling cannot be entirely eliminated those working at height must, as far as is reasonably practicable, be trained to avoid falling and how to avoid or minimise injury to themselves should they fall.

The place used for work at height is safe.
This includes the means of access and egress.

Equipment for working at height is appropriately selected.
As far as is reasonably practicable provide equipment to prevent a fall.
If it is not possible to entirely eliminate the risk of a fall occurring then all that is reasonably practicable to minimise the distance and effect of a fall must be done.
Ensure equipment is maintained and inspected to the standard required by the Regulations.
When selecting equipment a duty holder must:
Use the most suitable equipment
Give collective protection measures priority over personal protective measures i.e. installing guardrails in preference to providing safety harnesses. Ladders and stepladders should be considered as the last option when identifying equipment and methods of work.
Take account of working conditions.
Consider the risk to safety of all those at the place where the work equipment is to be used. This is of particular concern if the area is a thoroughfare.
The HSE publication ‘Safe use of Ladders and Stepladders’ is a useful reference and should be referred to when considering any work involving ladders and stepladders

Equipment used for working is inspected appropriately.
Inspection is defined by the Regulations as ‘such visual or more rigorous inspection by a competent person as is appropriate for safety purposes...(including) any testing appropriate for these purposes’. Anyone inspecting equipment for working at height must have received appropriate training or instruction in the specific equipment they inspect. This training is not offered within the University but can be arranged if necessary, contact Christina Kirby to discuss.
Each individual place where work at height is to be done must be checked on every occasion before being used (as far as is reasonably practicable).
Comply with the inspection requirements detailed in Schedules 2-6 of the Regulations i.e. collective means of protection, working platforms, scaffolding, collective and personal fall arrest systems & ladders. These are summarised below.
After installation and/or assembly if safety depends on how it is assembled/ installed.
As often as necessary to ensure safety, in particular to detect and remedy deterioration in good time.
Any equipment put into use that has come from another business, or equipment that leaves UAL must be accompanied by an indication that the last inspection required by the Working at Height Regulations and LOLER (M 02) have been carried out.
Any platform from which a person could fall more than 2m is inspected in place before use and not more than 7 days before use.
For construction sites the person inspecting a platform must prepare the report before going off duty and give the report (or a copy) to the person for whom the inspection was
done within 24 hours of the inspection. It is the person managing the work’s responsibility
to ensure this is done. Inspection reports of platforms must be kept at a construction site until work is complete
and then at an office of the UAL for an additional 3 months. ‘Keeping’ means keeping it (or a
copy) safe from loss and unauthorised interference and so that a printed copy can be
supplied when required
All other records of an inspection must be kept until the next inspection has been carried
out.

Ensure the risks from fragile surfaces are properly controlled.
Many roof coverings are fragile and, although they should be labelled as such this is not
always done and it is not always obvious that a roof is fragile. No one should access any of
the university roofs without the written permission of the AFM or SFM, unless this access is
a designated walkway or emergency escape route. Fragile surfaces include non-weight bearing roof covering, skylights and vent covers. Fragile
surfaces also include vertical surfaces such as non-load bearing walls or wall coverings.
The person managing working at height must ensure that no one under his or her control
goes onto, leans against or works near a fragile surface unless it is not reasonably
practicable to carry out the work safely any other way.
If any work is carried out on, against or near a fragile surface the hierarchy of controls must
be followed (see above)
If any one is likely to go onto or near a fragile surface they must, as far as is reasonably
practicable, be made aware of the danger, preferably by prominent warning notices on the
approaches to the danger zone. There must be control measures to prevent falling, or if this
is not reasonably practicable fall arrest equipment should be provided and worn.

Properly control risks from falling objects.
All that is reasonably practicable must be done to prevent any objects falling e.g. by
attaching tools on lanyards to your work belt, or the access equipment.
If it is not reasonably practicable to prevent falling objects the person managing working
from height must ensure no one is injured, e.g. by preventing access to the area below
which work is being carried out.
Prevent anything being thrown or tipped from height if injury is likely.
Ensure nothing is stored in such a way that movement of the working platform could cause
injury.
If it is not possible to ensure there is no risk of injury from falling objects or persons the area
must be clearly signed and as far as is reasonably practicable, unauthorised access must be
prevented.